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October 13, 2020

VIA ECF

The Honorable Michael A. Shipp, U.S.D.J.
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Room 2020
Trenton, NJ 08608

RE: McKeon v. City of Asbury Park et al, No. 3:19-cv-08536-MAS-ZNQ

Dear Judge Shipp:

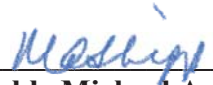
As Your Honor is aware, this firm represents Defendants the City of Asbury Park, Mayor John Moor, and Michael Capabiano (collectively, “Defendants”) in the above-referenced matter filed by Plaintiff Robert McKeon (“Plaintiff”) (Defendants and Plaintiff collectively, “Parties”). Please accept this correspondence as a follow-up to my October 9, 2020 correspondence to the Court advising that the Parties required additional time to agree to a form of settlement beyond the October 9, 2020 deadline established by Your Honor's September 25, 2020 Opinion and Order. (ECF Nos. 34 & 35).

As of this writing, the Parties remain on the verge of an agreement. Today, a revised and proposed final form of settlement agreement was forwarded from Defendants to Plaintiff for review and consideration. Defendants anticipate that no later than Friday, October 16, 2020, the Parties will submit the mutually agreed upon settlement agreement or further correspondence to the Court advising as to the status of negotiations.

I remain available at any time should the Court have any questions, concerns, or require additional information. Your Honor's continued attention and courtesies with respect to this matter are greatly appreciated.


Very truly yours,

So Ordered this 14th day of October, 2020.



Honorable Michael A. Shipp, U.S.D.J.

**FLORIO PERRUCCI STEINHARDT
CAPPELLI TIPTON & TAYLOR LLC**

By: 

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cc (via e-mail & ECF):

Patricia Barasch, Esq., Attorney for Plaintiff
Donna M. Vierio, City Manager
Eric Nemeth, Esq., General Counsel, NJIIF